

IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

MOHAMAD HAMAD

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Criminal No. 24-cr-257

MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE

Mohamad Hamad (“Mr. Hamad”) respectfully files this Motion to Modify Conditions of Pretrial Release, and in support, he states:

1. On November 19, 2024, Mr. Hamad was charged in a two-count indictment alleging that he was involved in a conspiracy to damage or deface religious real property, in violation of 18 U.S.C. §§ 371, 247(c), 247(d)(5), and (2).
2. On October 30, 2024, Mr. Hamad made his initial appearance on this matter. At that time, he was released on an unsecured \$50,000 bond with conditions, including that he be placed on home detention. *See* ECF 17 at 5.
3. Mr. Hamad seeks to remove the condition that he be placed on home detention. He asks the court to instead impose a curfew with all other conditions of his pretrial release to remain in place. Under the proposed modification, he would remain on electronic monitoring.
4. Mr. Hamad has been on home detention for approximately 152 days, with no violations of any kind reported to this Honorable Court. He has

demonstrated compliance with the Court's previously imposed stringent set of conditions and earned the trust to be permitted to leave his home during a curfew window.

5. In further support of this motion, Mr. Hamad offers several letters from members of the community that speak to his character, which 18 U.S.C. § 3142(g) names as a factor to be considered when a judicial officer is considering conditions of release for the accused.¹
6. Undersigned counsel conferred with United States Probation Officer ("USPO") Benjamin Orrison, who stated that while removal from home detention is not recommended by USPO at this time, Officer Orrison confirmed that Mr. Hamad has been compliant with all his conditions of pretrial release.

WHEREFORE, Mr. Hamad respectfully requests these modifications of his conditions of pretrial release within the proposed Order of Court be granted.

Respectfully submitted,

/s/ Yemi T. Olaiya

Yemi T. Olaiya

Assistant Federal Public Defender

¹ See Exhibits A - H attached to this motion.